



PROGRESS REPORT NO. 188

TO: Bonnie Arthur, U.S. Environmental Protection Agency (EPA) – via electronic mail
Robert Tan, EPA – via electronic mail

FROM: Denise Mills, Teck American Incorporated (TAI)

Cc: Kris McCaig, TAI – via electronic mail
Rob Orr, TAI – via electronic mail

DATE: March 14, 2022

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RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study (RI/FS) –
Progress Report No. 188, Month Ending February 2022

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Soil Amendment Technology Evaluation Study (SATES) – TAI continued effort through the month to review, perform quality checks, and validate analytical results for field-scale treatability test soil samples collected in May, July, and October 2021 as results have become available. In January 2022, TAI received the remaining sets of sample analytical data for samples collected in 2021 and were validated. TAI continued preparation of the draft interim data summary report (IDSR) that will summarize data collected during the first year of field work completed for SATES Phases III and IV, as described in the associated work plan. This IDSR will be submitted to EPA and the SATES team for review by March 25, 2022.

Baseline Ecological Risk Assessment (BERA) – TAI submitted the pre-draft terrestrial BERA (the Draft Interim Partial Upland BERA) to EPA on June 24, 2021, and received EPA's full set of draft comments on December 1, 2021. TAI and EPA had a technical call on December 9, 2021 to review and discuss additional soil data sets that should be evaluated in the draft Upland BERA and draft Upland Remedial Investigation (RI) Report (see below), as well as EPA's comments indicating that additional sediment data should be collected from select upland lakes. TAI submitted a request for clarification of five of EPA's comments on the draft Interim Partial Upland BERA to EPA on January 5, 2022, and three additional clarifying questions to EPA on February 2, 2022. EPA's responses to these questions will help TAI prepare responses to the associated comments on the draft Interim Partial Upland BERA. TAI and EPA discussed preliminary responses to TAI's first

set of questions during a call on February 9, 2022; TAI is awaiting EPA's response to both sets of clarifying questions. As of this writing, on March 3, 2022, TAI submitted an updated table summarizing the available soil data sets that meet criteria for use in the Upland BERA and a memorandum summarizing data attributes collected during EPA's soil removal action assessment in Northport in 2005, which verified sample locations and whether the data were collected from "improved" or "unimproved" locations to facilitate EPA's review and consideration of TAI's questions regarding soil data collected for the 2005 Northport removal action assessment.

Aquatic BERA – TAI received a letter from EPA on December 23, 2021 listing studies and data sets that should be evaluated for inclusion in the draft Aquatic BERA, and that provided a draft data usability evaluation prepared by EPA. This letter was provided as an update to a memorandum, dated August 23, 2017, EPA issued to TAI and includes EPA's evaluation of data sets developed since August 2017. TAI continued its review of EPA's updated evaluation submitted comments on EPA's updated data usability evaluation on February 18, 2022.

RI Report – TAI received EPA's full set of draft comments on the pre-draft RI report via email on December 23, 2021 and is the process of reviewing the comments. A call was held on January 31, 2022 to discuss some of EPA comments on the human health risk assessment summary provided in the pre-draft RI report. Additional calls may be scheduled to discuss other technical and programmatic comments to advance resolution of comments on the pre-draft RI report.

2019 Phase 3 Sediment Study:

- Split Sediment and Porewater Chemistry Analyses, EPA Data Validation and Comparison Report – TAI received EPA's initial draft interlaboratory split sample comparison and evaluation memorandum via email on June 16, 2020. TAI reviewed the memo and provided comments to EPA on July 14, 2020. Subsequently, EPA requested, and TAI provided additional sample splits for analysis in accordance with EPA's Phase 3 Sediment Study Split Sample Chemistry Quality Assurance Project Plan Addendum that was finalized on September 21, 2020. EPA and TAI participated on a call on May 7, 2021, along with EPA's contract laboratory and TAI's contracted laboratory personnel, to discuss the results of the additional sediment sample analyses. On August 11, 2021, TAI received EPA's revised sediment and porewater split sample chemistry analyses data validation and comparison memo and EPA's response to comments. TAI submitted comments on the revised sample comparison memo for submittal to EPA on September 7, 2021. TAI is awaiting the revised draft interlaboratory split sample comparison and evaluation memorandum from EPA.
- Split Sample Bioassay Testing, EPA Data Verification and Validation Report for the U.S. Geological Survey Columbia Environmental Research Center (CERC) chemistry data – On March 31, 2021, TAI received EPA's Data Verification and Validation Report for the CERC porewater chemistry data for the 2019 Phase 3 sediment study bioassay split sample program. TAI provided comments to EPA on the data verification and validation report on April 23, 2021. TAI received EPA's second revision of the bioassay chemistry data verification and validation report on August 5, 2021 with EPA's responses to TAI's

comments on the previous draft. TAI provided comments on this second revision of the data verification and validation report to EPA on August 19, 2021. TAI received the third revised draft bioassay chemistry data verification and validation report from EPA on January 31, 2022 and as of this writing reviewed the revised report and EPA's responses to TAI comments and noted that supplemental comments TAI submitted to EPA on September 1, 2021 and October 19, 2021 have not been addressed. TAI provided a summary of those comments via email to EPA on February 22, 2022 and requested clarification from EPA whether the referenced data validation report will be revised to address the supplemental comments.

- Split Sample Bioassay Testing, EPA Interlaboratory Split Sample Bioassay Comparison Memo – TAI received EPA's Interlaboratory Split Sample Bioassay Comparison Memo on June 21, 2021. TAI provided comments on this memo to EPA on July 30, 2021, and EPA provided a revised memo and responses to TAI comments on October 5, 2021. TAI reviewed and provided comments on the revised memo and EPA responses to EPA on November 23, 2021, and is awaiting the revised draft split bioassay comparison memo from EPA.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4515.